



Intellectual Property Law, Litigation, and Appeals

FILED VIA ECF

January 27, 2022

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Michael Colello and Charles Sayegh*, 20 CR 613 (LTS)
Letter Motion to Reschedule hearing date from February 8 to March 8 and
[PROPOSED] ORDER

Dear Judge Swain,

On behalf of the parties, who have consented to this motion, we respectfully request an adjournment of the telephone conference scheduled for February 8, 2022 at 2pm to March 8, 2022 at 2pm.

Counsel for Michael Colello's office, located at Weil Bldg, 229 E. Main Street, #203, Hillsboro OR, was destroyed in an arson fire on January 2, 2022. (See <https://www.msn.com/en-us/news/crime/hillsboro-resident-arrested-on-suspicion-of-arson-in-devastating-downtown-fire/ar-AASvTJk>). Handling the aftermath of this fire has consumed defense counsel's time.

With the consent of the parties and including the Government, we also respectfully request that the Court exclude time under the Speedy Trial Act from today, January 27, 2022, through the date of any granted adjournment of the telephone conference pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interests of the defendants and the public in a speedy trial are outweighed here by the ends of justice served by allowing the defendants to appear together before the Court and in the interim to continue reviewing discovery and considering the availability of any pretrial motions and the possibility of any pretrial dispositions.

The foregoing adjournment request is granted. The pretrial conference is hereby adjourned to March 8, 2022, at 2:00 pm. The Court finds, pursuant to 18 USC section 3161(h)(7) (A), that the ends of justice served by an exclusion of time from today's date through March 8, 2022, outweigh the best interests of the public and the defendants in a speedy trial, for the reasons explained above. Docket entry no. 40 is resolved.

Respectfully Submitted,

J. Curtis Edmondson
Counsel for Defendant Michael Colello

SO ORDERED:

1/28/2022

/s/ Laura Taylor Swain, Chief USDJ
UNITED STATES DISTRICT COURT.